

**UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT  
OF FLORIDA  
20-cv-81205-RAR**

**SECURITIES AND  
EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**COMPLETE BUSINESS  
SOLUTIONS GROUP, INC. d/b/a  
PAR FUNDING, et al.,**

**Defendants.**

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**DEFENDANT’S UNOPPOSED MOTION TO APPEAR AT HEARING  
VIA VIDEO CONFERENCE**

Defendant, **JOSEPH COLE BARLETA** (“Defendant”), by and through undersigned counsel, respectfully files this Unopposed Motion for Defendant and Defendant’s undersigned counsel, Bettina Schein to appear via video conference at the Hearing on Defendant’s Motion to Discharge the Receiver and Motion to Dismiss the Amended Complaint set for August 25, 2021. In support thereof, Defendant states as follows:

1. Defendant who resides in Philadelphia, Pennsylvania and undersigned counsel, Bettina Schein, who resides and has offices in New York, New York, request permission to appear before this Court on August 25, 2021 at 10:00 AM, via video conference.

2. Counsel and Mr. Cole respectfully make the instant request to avoid the expense of travel at this time, and note that co-counsel who have law offices in Florida will appear in court in person.

3. Counsel has contacted counsel for the Securities and Exchange Commission, Amie

Berlin, with respect to this Motion, who advised that the Commission has **no objection** to the relief requested herein.

**WHEREFORE**, Defendant, **Joseph Cole Barleta**, respectfully requests this Court to enter an order allowing Defendant and Defendant's Counsel to appear at the August 25, 2021 Hearing on Defendants' Motion to Discharge the Receiver and Motion to Dismiss the Amended Complaint via Video Conference.

Respectfully submitted,

Bettina Schein, Esq.  
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*Attorney for Joseph Cole Barleta*

*/s/ Bettina Schein*  
BETTINA SCHEIN  
*Admitted Pro Hac Vice*

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*Local Counsel for Joseph Cole Barleta*

*/s/ Andre G. Raikhelson*  
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ANDRE G. RAIKHELSON  
Florida Bar No. 123657

**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2021, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: /s/ Andre G. Raikhelson  
ANDRE G. RAIKHELSON